



SUSAN COMBS, COMMISSIONER

**TEXAS DEPARTMENT
OF AGRICULTURE**

P.O. Box 12847
AUSTIN, TEXAS 78711
(512) 463-7476
FAX (512) 463-1104
FOR THE HEARING IMPAIRED:
1-800-735-2988 (VOICE)
1-800-735-2989 (TDD)
www.agr.state.tx.us

May 6, 2002

National Organic Standards Board
Austin, Texas
Meeting May 6 – 8, 2002
Public Comment

Dear Members of the Board:

At the request of our certified organic producers, the Texas Department of Agriculture (TDA) would like to take this opportunity to make the following comments regarding the petition to include Spinosad, a fermentation product derived from an actinomycete, as a material allowed for use in organic production.

In 2000, organic cotton producers in the Texas High Plains experienced a severe outbreak of beet armyworms over a wide geographic area. The population densities were very high, and would have caused substantial economic loss if left unchecked. Certified producers requested that the department consider allowing the use of a product containing Spinosad as the active ingredient for emergency control of beet armyworms. The TDA Organic Standards Advisory Committee discussed the issue and was presented with technical information about the product. Their recommendation was to allow the product to be used as an emergency measure in organic cotton. The department concurred, and informed producers that the product would be allowed for the 2000 and 2001 production seasons.

In the Lower Rio Grande Valley, where the majority of Texas citrus and vegetable production is located, TDA has worked cooperatively with USDA for many years to control Mexican Fruit Fly and to monitor for Mediterranean Fruit Fly. Baits containing malathion are normally used to treat areas surrounding traps where fruit flies are detected. Recognizing that this treatment protocol would be detrimental to organic producers in the area, USDA has developed a fruit fly bait treatment containing Spinosad to be used as an alternative to the malathion bait on organic farms. Having this tool available to eliminate a local outbreak of these devastating pests is essential to preserving the viability of organic farms in the region.

For these and similar emergency uses after preventative measures have proved inadequate, the allowance of Spinosad as an active ingredient in pesticide products formulated in accordance with the National Organic Standards appears to be warranted.

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